

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SARAH ERHART, an individual,

Case No. 2:22-cv-00472

Plaintiff,

v.

**DECLARATION OF JULIE BRUBAKER
IN SUPPORT OF NOTICE OF
REMOVAL**

ZIMMER, INC., a Delaware corporation dba
ZIMMER BIOMET; ZIMMER US, INC., a
Delaware corporation dba ZIMMER BIOMET;
BIOMET, INC., an Indiana corporation dba
ZIMMER BIOMET; and DOES 1-10,

Defendants.

I, Julie Brubaker, declare as follows:

1. I am Vice President and Associate General Counsel for Zimmer Biomet. I am over the age of 18 years, have personal knowledge of, and am competent to testify to the matters set forth herein. I offer this declaration in support of Defendants' Notice of Removal.

2. The principal place of business for the three corporate defendants named in this matter is in the State of Indiana (specifically Warsaw, Indiana), the location of their headquarters and where their officers direct, control, and coordinate each corporation's activities.

3. I have reviewed Plaintiff's salary history. Between December 2, 2019 and April 4, 2020, Plaintiff was paid an annual salary of \$80,000, which equates to an hourly rate of \$38.46 (\$80,000 ÷ 2080 hours) and \$57.69 at time and one half.

1 3. I have reviewed Plaintiff's salary history. Between December 2, 2019 and April 4,
2 2020, Plaintiff was paid an annual salary of \$80,000, which equates to an hourly rate of \$38.46
3 (\$80,000 ÷ 2080 hours) and \$57.69 at time and one half.

4 4. Between April 6, 2020 and May 17, 2020, Plaintiff was paid an annual salary of
5 \$64,000, which equates to an hourly rate of \$30.76 and \$46.14 at time and one half.

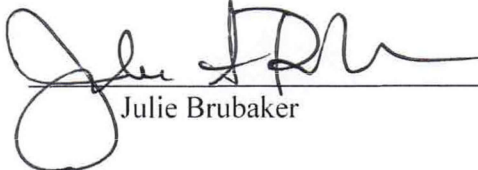
6 5. Between May 18, 2020 and March 21, 2021, Plaintiff was paid an annual salary of
7 \$80,000, which equates to an hourly rate of \$38.46 and \$57.69 at time and one half.

8 6. Between March 22, 2021 and October 3, 2021, Plaintiff was paid an annual salary
9 of \$82,800, which equates to an hourly rate of \$39.81 and \$59.72 at time and one half.

10 7. Between October 4, 2021 and March 7, 2022, Plaintiff was paid an annual salary
11 of \$92,000, which equates to an hourly rate of \$44.23 and \$66.35 at time and one half.

12 I declare under the penalty of perjury under the laws of the State of Indiana that the
13 foregoing is true and correct.

14 DATED this 8th day of April, 2022.

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18 Julie Brubaker
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